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October 23, 2024

**VIA ECF**

Magistrate Judge Victoria Reznik  
United States District Court  
Southern District of New York  
300 Quarropas Street, Courtroom 420  
White Plains, NY 10601-4150

**Re: Wave Studio, LLC v. General Hotel Management, Ltd., et al.**  
**Civil Action No.: 7:13-cv-09239 (CS)(VR)**

Dear Judge Reznik:

Smith, Gambrell & Russell, LLP represents trivago N.V. ("trivago") in the above-referenced action (the "Action").

I am writing pursuant to the Court's October 21, 2024 Order (the "Order") to inform Your Honor that trivago (a) will not join any part of the Omnibus Motion to be served by December 6, 2024 pursuant to the Order; (b) will not be serving a Supplemental Memorandum to the Omnibus Motion; (c) will not be serving at any subsequent date a Rule 12 motion based on defenses regarding the statute of limitations, personal jurisdiction or extraterritoriality; and (c) reserves its right to assert all other claims or defenses in the Action pursuant to the Order, including the right to seek dismissal of Plaintiff's claims against trivago based on the statute of limitations and/or extraterritoriality on summary judgment and/or at trial.

Respectfully,

A handwritten signature in blue ink, appearing to read 'RJM'.

Roger Juan Maldonado

**cc: (via ECF)**  
All counsel of record